

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Keith Dotson

Case: 2:19-mj-30587

Judge: Unassigned,

Filed: 11-08-2019

SEALED MATTER (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 10-11, 2018 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 USC § 2252A(a)(2)

Receipt and distribution of child pornography

18 USC § 2252A(a)(5)(B)

Possession of child pornography.

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

NOV 08 2019

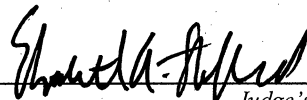
Date: _____

City and state: Detroit, Michigan

Complainant's signature

Tyler A. Bennett, Special Agent (USSS)

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT
AND ARREST WARRANT**

INTRODUCTION

I, Tyler A. Bennett, having first been duly sworn, do hereby depose and state as follows:

1. I am employed as a Special Agent for the United States Secret Service in Detroit, Michigan, and am currently assigned to the Michigan Internet Crimes Against Children (ICAC) Task Force. I have been employed as a Special Agent since August of 2017. I have participated in numerous arrests for various violations of law; as well as numerous seizures of currency, monetary instruments, computer equipment, and business and financial records. I have interviewed multiple subjects who have possessed, distributed, manufactured, and received child pornography images. Along with other agents, I am responsible for enforcing federal criminal statutes involving the sexual exploitation of children pursuant to Title 18, United States Code, Sections 2251 and 2252A.

2. This affidavit is made in support of a criminal complaint for KEITH EDWARD-GERALD DOTSON, date of birth XX/XX/1985, for violations of 18 U.S.C. § 2252A (a)(2) (receipt and distribution of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of child pornography).

3. This affidavit does not contain every fact that I have learned during the course of this investigation. I have set forth only those facts necessary to establish probable cause to believe that DOTSON has violated the above statutes. The information contained in this affidavit is based upon my personal knowledge, training and experience, as well as the combined training and experience of other law enforcement officers and agents with whom I have had discussions.

4. Pursuant to the provisions of 18 U.S.C. §§ 2252A, it is a federal crime for any person to knowingly possess, receive or distribute child pornography that has been mailed, shipped or transported in interstate or foreign commerce, or which contains materials which have been mailed, or has been shipped or transported, by any means including a computer, or to knowingly reproduce any visual depiction for distribution in interstate or foreign commerce by any means including a computer or through the mail. Pursuant to the provisions of 18 U.S.C. § 2256, “child pornography,” as used in this affidavit, means any visual depiction, including any photograph, film, video, picture, or computer or computer generated image or picture of sexually explicit conduct where the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct.

PROBABLE CAUSE

5. On December 11, 2018, the social media site Tumblr submitted a CyberTip to the National Center for Missing and Exploited Children (NCMEC).

Tumblr reported that username ltgrlv4, with email address hackerfish@protonmail.com, uploaded approximately 15 videos and images depicting child pornography. These uploads occurred on or about December 10, 2018.

6. I have reviewed these images and believe, based on my training and experience, that these images meet the federal definition of child pornography.

Examples of these images include:

- a. An image depicting a girl, approximately 5 years of age, who is completely nude. The girl is laying on a pink blanket with white stars with her legs spread. The girl has pulled her labia back, exposing her vagina, while an adult male's erect penis is being inserted into her vagina.
- b. An image depicting a girl, approximately 3-4 years of age, who is completely nude. The girl is on all fours laying on a multicolored blanket looking into the camera. An adult male is seen standing behind her, holding his erect penis, and placing it against the girl's buttocks.

7. On January 29, 2019, law enforcement submitted a search warrant to Tumblr for content associated with username ltgrlv4. The search warrant return included numerous images of child pornography posted by username ltgrlv4.

8. On July 8, 2019, a search warrant was issued for subscriber information associated with the IP address ltgrlv4 used on December 9, 2018, the day before ltgrlv4 uploaded child pornography. The IP address resolved to an address on Wakenden Street in Redford, Michigan, in the Eastern District of Michigan. The

subscriber for the IP address was identified as DOTSON.

9. On July 9, 2019, law enforcement executed a search warrant at the address on Wakenden Street. DOTSON was present during the search warrant, along with his wife. Numerous electronic devices were seized, including DOTSON's cell phone and computer.

10. On July 10, 2019, the U.S. Secret Service conducted a forensic review of DOTSON's computer and located hundreds of videos and images depicting child pornography, including several of the images provided in the search warrant return for Tumblr username ltgrlvr⁴. The forensic review is ongoing.

11. On July 18, 2019, Michigan State Police conducted a forensic review of DOTSON's cell phone. Approximately 20,000 images and videos of child pornography were found on DOTSON's cell phone. Also found on DOTSON's cell phone were hundreds of messages exchanged with numerous individuals involving the discussion and sharing of child pornography. For example, on or about December 11, 2018, using Chat Service A¹, a username similar to the one used by the Tumblr account—ltgrlvr— sent an image of a prepubescent female performing oral sex on an adult male's erect penis to several other members of the chat group.

¹ The true name of Chat Service A is known to law enforcement but not revealed here to protect the integrity of the ongoing investigation.

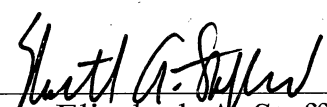
CONCLUSION

12. Based on the foregoing, there is probable cause to believe that KEITH EDWARD-GERALD DOTSON has distributed and received child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A); and possessed child pornography, in violation of 18 U.S.C. § 2252(a)(5)(B).

Respectfully submitted,


Tyler A. Bennett, Special Agent
U.S. Secret Service

Subscribed and sworn to before me
On the 8th day of November, 2019.


Hon. Elizabeth A. Stafford
UNITED STATES MAGISTRATE JUDGE

Date: NOV 08 2019